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(additional counsel on signature page)*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KAREN CORNISH-ADEBIYI and LUIS
SANTIAGO, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

CAESARS ENTERTAINMENT, INC.,
BOARDWALK REGENCY LLC d/b/a
CAESARS ATLANTIC CITY HOTEL &
CASINO, HARRAH'S ATLANTIC CITY
OPERATING COMPANY, LLC d/b/a
HARRAH'S RESORT ATLANTIC CITY
HOTEL & CASINO, TROPICANA ATLANTIC
CITY CORPORATION d/b/a TROPICANA
CASINO AND RESORT ATLANTIC CITY,
MGM RESORTS INTERNATIONAL, MARINA
DISTRICT DEVELOPMENT COMPANY, LLC
d/b/a BORGATA HOTEL CASINO & SPA,
HARD ROCK INTERNATIONAL INC.,
SEMINOLE HARD ROCK SUPPORT
SERVICES, LLC, BOARDWALK 1000, LLC
d/b/a HARD ROCK HOTEL & CASINO
ATLANTIC CITY, and CENDYN GROUP, LLC,

Defendants.

Case No. 1:23-cv-02536 (KMW) (EAP)

MONICA BLAIR-SMITH, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CAESARS ENTERTAINMENT, INC.,
BOARDWALK REGENCY LLC d/b/a
CAESARS ATLANTIC CITY HOTEL &
CASINO, HARD ROCK INTERNATIONAL
INC., SEMINOLE HARD ROCK SUPPORT
SERVICES, LLC, BOARDWALK 1000, LLC
d/b/a HARD ROCK HOTEL & CASINO
ATLANTIC CITY, HARRAH'S ATLANTIC
CITY OPERATING COMPANY, LLC d/b/a
HARRAH'S RESORT ATLANTIC CITY
HOTEL & CASINO, MGM RESORTS
INTERNATIONAL, MARINA DISTRICT
DEVELOPMENT COMPANY, LLC d/b/a
BORGATA HOTEL CASINO &
SPA, TROPICANA ATLANTIC CITY
CORPORATION d/b/a TROPICANA CASINO
AND RESORT ATLANTIC CITY, and
CENDYN GROUP, LLC,

Defendants.

Case No. 1:23-cv-06506

JACOB FABEL, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

BOARDWALK 1000, LLC d/b/a HARD ROCK
HOTEL & CASINO ATLANTIC CITY,
BOARDWALK REGENCY LLC d/b/a
CAESARS ATLANTIC CITY HOTEL &
CASINO, CAESARS ENTERTAINMENT, INC.,
HARD ROCK INTERNATIONAL INC.,
HARRAH'S ATLANTIC CITY OPERATING

Case No. 1:23-cv-06576

COMPANY, LLC d/b/a HARRAH'S RESORT
ATLANTIC CITY HOTEL & CASINO,
MARINA DISTRICT DEVELOPMENT
COMPANY, LLC d/b/a BORGATA HOTEL
CASINO & SPA, MGM RESORTS
INTERNATIONAL, SEMINOLE HARD ROCK
SUPPORT SERVICES, LLC, TROPICANA
ATLANTIC CITY CORPORATION d/b/a
TROPICANA CASINO AND RESORT
ATLANTIC CITY, and CENDYN GROUP, LLC,

Defendants.

**Notice of Amended Proposed Orders for
Unopposed Motion to Consolidate**

Attached to this Notice are two amended proposed orders for Plaintiffs' pending Unopposed Motion to Consolidate (ECF No. 57), set for consideration on October 2, 2023.

In the Unopposed Motion to Consolidate, Plaintiffs (1) requested consolidation of the three above-captioned actions ("Actions") and (2) notified the Court of a stipulated agreement ("Joint Scheduling Stipulation") among all parties in the Actions that Defendants' time to respond to all three complaints is suspended pending the Motion to Consolidate, including an agreement to suspend the deadlines in the Stipulation and Order at ECF No. 44.

After this Court set the October 2, 2023 date for the Motion to Consolidate, one of Defendants' counsel, David Lesser of King & Spalding LLP, notified Plaintiffs he had spoken by phone with Magistrate Judge Pascal's Chambers regarding whether the Joint Scheduling Stipulation could be so-ordered before October 2, 2023. According to Mr. Lesser, Chambers advised that the parties may file amended proposed orders to replace the current one (ECF No. 57-1), such that one order would address the Joint Scheduling Stipulation and the other the consolidation issue. According to Mr. Lesser, while Judge Pascal may consider the proposed order

on the Joint Scheduling Stipulation before October 2, 2023, this Court will consider the Motion to Consolidate on October 2, 2023, as scheduled.

Mr. Lesser requested that Plaintiffs file amended proposed orders in line with the above guidance from Judge Pascal's Chambers. The parties across the Actions have no objection.

Accordingly, two amended proposed orders are attached:

1. Proposed order on the Joint Scheduling Stipulation; and
2. Amended proposed order on the Unopposed Motion to Consolidate.

Dated: August 31, 2023

Respectfully submitted,

/s/ Mindee J. Reuben

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/s/ Joseph J. DePalma

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